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November 28, 2023

Hon. Sidney H. Stein  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

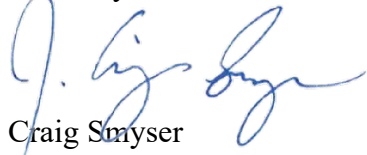
Re: *Authors Guild et al. v. OpenAI Inc. et al.*, No. 1:23-CV-08292-SHS  
*Sancton v. OpenAI Inc. et al.*, No. 1:23-CV-10211 (Unassigned)

Dear Judge Stein:

My firm represents nonfiction author Julian Sancton in the potentially related matter *Sancton v. OpenAI Inc. et al.*, No. 1:23-CV-10211, which was filed in this District on November 21, 2023. Mr. Sancton brings claims of copyright infringement and contributory copyright infringement against OpenAI entities and Microsoft Corporation on behalf of a putative class of owners of nonfiction works. We have filed a Statement of Relatedness identifying the *Sancton* Action as potentially related to the *Authors Guild* Action pending before Your Honor. *Sancton* Action, No. 1:23-CV-10211, Dkt. 3. The parties in the *Authors Guild* Action have also identified the *Sancton* Action in their Rule 26(f) Report and Proposed Case Management Plan filed last week. *Authors Guild* Action, No. 1:23-CV-08292-SHS, Dkt. 31. To date, the *Sancton* matter has not been assigned.

Counsel for Mr. Sancton will attend tomorrow's pre-trial conference in the *Authors Guild* Action and will be prepared to answer any questions Your Honor may have about the *Sancton* Action. Thank you.

Sincerely,



Craig Smyser

cc: Counsel of Record in the *Authors Guild* Action